

RE: Proceeding 03-104

Ladies and Gentlemen:

I have been an amateur radio operator since 1955, and have held an Amateur Extra Class license since 1968. I also hold a degree in electrical engineering and have both military and civilian experience in electronics and in communications.

My comments reflect my concern over the potential widespread deployment of Broadband Over Power Line (BPL) technology which, if not properly regulated, could cause potentially significant harmful interference to the amateur radio service which is a primary user of frequencies allocated within the HF and lower VHF frequency spectrum.

For more than half a century, amateur radio operators in this country have represented a dependable source of communications during civil emergency conditions and natural disasters. Often, amateur radio operators have provided the only source of reliable communications in the immediate aftermath of such situations. I have personally participated in several emergency communications training exercises to prepare for potential future conditions when amateur radio service would be of critical importance. The post-September 11 period has served to further heighten the importance of amateur radio service. Clearly, the amateur radio service is now a vital element in this country's national security communications network. Therefore, as a primary user of several frequency segments in the HF and lower VHF spectrum, it must not be jeopardized by interference from other sources of excessive radiation on these same frequencies.

Part 15 of the Commission's rules now specifies limits on the emission of energy from unlicensed intentional emitters, to which power line communications is now subject. Were BPL to be deployed on a widespread basis under these restrictions, the maximum permitted energy level would even then be sufficient to cause harmful interference to weak signal reception.

The principal concern regarding interference from BPL systems is that they would radiate energy over a wide span of frequencies and affect many existing communications services that are now primary users of specific frequency segments. BPL interference would therefore be much more widespread than single point sources of radiated energy such as electric motors, consumer electronics devices, switching power supplies, etc., and affect many more services and their users.

The Commission has expressly stated its intention to protect licensed primary users of frequencies within the spectrum available to BPL. To honor that commitment it must establish appropriate regulations on the widespread deployment of BPL technology that would otherwise have a materially adverse impact on the amateur radio service and other primary users of allocated frequencies in the HF and lower VHF range. Unintended radiation levels from BPL systems simply must be regulated to such a degree that will not impair amateur radio and other communications services.

Thank you for considering these comments.

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